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**LEGALFORCE RAPC WORLDWIDE**

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LegalForce RAPC Worldwide, P.C.  
LegalForce Inc., and Raj V. Abhyanker

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**UNLIMITED JURISDICTION**

1. LEGALFORCE RAPC  
WORLDWIDE, P.C.;  
2. LEGALFORCE INC.; and  
3. RAJ V. ABHYANKER,  
  
Plaintiffs,  
  
v.  
  
1. THE STATE BAR OF  
CALIFORNIA;  
LEGALZOOM.COM, INC.;  
and  
UNITED STATES PATENT &  
TRADEMARK OFFICE.  
  
  
Defendants;  
  
AND DOES 1-50.

Case No. 3:17-cv-07194-MMC

**DECLARATION BY  
PLAINTIFF RAJ V.  
ABHYANKER IN SUPPORT OF  
ADMINISTRATIVE MOTION  
AND [PROPOSED] ORDER TO  
RESCHEDULE HEARING**

DATE: March 23, 2018

TIME: 9 A.M.

JUDGE: Hon. Maxine M. Chesney

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3 1. I, Raj Abhyanker, make this Declaration in Support of a request for a  
4 Motion For Leave To File Second Amended Complaint. The matters stated in  
5 this declaration are true of my personal knowledge, and if called upon to so, I  
6 could and would testify competently thereto.  
7

8 2. I am a Plaintiff in this case and a California licensed attorney practicing  
9 patent & trademark law before the USPTO with a principal place of business at  
10 1580 W. El Camino Real Suite 10, Mountain View California 94040.  
11

12 3. I am the sole shareholder of Plaintiff LegalForce RAPC Worldwide and is  
13 a CEO of Plaintiff LegalForce, Inc.  
14

15 4. On **December 19, 2017**, I filed my initial Complaint, *pro se*, in this case.  
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17 5. On **January 2, 2018**, I filed my a First Amended Complaint (FAC), *pro*  
18 *se*, to correct errors and add additional facts.

19 6. Plaintiffs subsequently retained outside counsel to advise them in this  
20 litigation. Plaintiffs now believe that further amendment would benefit the Court  
21 and the parties by streamlining the issues in dispute.  
22

23 7. Defendant USPTO's response is due **April 8, 2018**, and for all other  
24 defendants response is due **February 20, 2018**.  
25

26 8. On **February 7, 2018**, Plaintiffs requested that each defendant agree to a  
27 stipulation whereby Defendants would not be required to respond to the FAC,  
28

1 Plaintiffs would have time to file a SAC, and Defendants would have 30 days  
2 thereafter to respond.  
3

4 9. The State Bar of California did not agree to the stipulation.  
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6 10. On **February 8, 2018**, the Plaintiffs retained the services of antitrust  
7 litigators Mr. Jarod Bona and his colleague Aaron R. Gott at Bona Law P.C. to  
8 evaluate the First Amended Complaint (FAC) and to take a leading role in the  
9 Plaintiffs drafting of a Second Amended Complaint (SAC).  
10

11 11. The Plaintiffs also separately formally retained Charles T. (Chris)  
12 Compton, an antitrust litigator at the Compton Antitrust Law office (retired  
13 antitrust partner of Wilson Sonsini Goodrich & Rosati P.C.) and Emil Ali of  
14 Carr Butterfield LLC, a professional responsibility attorney (formerly a senior  
15 staff attorney at the USPTO Office of Enrollment and Discipline) to assist Bona  
16 Law PC.  
17  
18

19 12. In addition, the Plaintiffs have just internally hired at LegalForce RAPC  
20 Worldwide a full time legal assistant (Randall Hull) starting on **February 26,**  
21 **2018** and new full time associate litigation attorney (Wensheng Vincent Ma),  
22 starting **March 1, 2018** to assist with this litigation.  
23  
24

25 13. External counsel and newly starting internal staff both require time to  
26 assess the FAC and assist the Plaintiffs in drafting a Second Amended  
27 Complaint. The SAC may eliminate the need for Court resolution of some or all  
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1 issues raised by the motion to dismiss.

2  
3 14. Moreover, given the complex nature of the issues raised by the motion to  
4 dismiss, Plaintiffs require additional time to respond.

5  
6 15. The Plaintiffs do not presently have any desire for any of their external  
7 counsel to make a formal appearance in this case for cost containment reasons,  
8 but have retained external counsel for a full range of services in conjunction with  
9 review and preparation of the SAC without making an appearance.

10  
11 16. **Exhibit A** is a true and correct copy of an email that I sent to the State Bar  
12 of California on Presidents Day, **February 19, 2018** asking them if they would  
13 be willing to stipulate to extending the time for this hearing.

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15 17. **Exhibit B** is a true and correct copy of a response that I received from the  
16 State Bar of California today on **February 20, 2018** denying my requested  
17 stipulation.

18  
19 18. I declare under the penalty of perjury under the law of the State of  
20 California that the foregoing is true and correct.

21  
22  
23 Respectfully submitted this **Tuesday February 20, 2018** in Honolulu, Hawaii.

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25 

26  
27 Raj V. Abhyanker